

# EXHIBIT P

## Judd Burstein

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**From:** Tyrone Blackburn <tblackburn@tablackburnlaw.com>  
**Sent:** Wednesday, January 26, 2022 11:15 PM  
**To:** Judd Burstein  
**Cc:** Steven Ciar's Husband; Emily Finestone; Peter B. Schalk; Victor Weberman  
**Subject:** Re: Sanctions motion

Judd,

Did you contact the husbands or wives of the other commenters of the YouTube video Mrs. Gordon commented on? The answer is no. After you were asked to cease commenting on, and referencing your opposing counsels wife, you ignored it and did it again the day after. So your actions were creepy and very very weird, and one would and could view your very weird creepy action as cyberstalking. I am sorry if you cannot see that.

I provided my terms for a withdrawal (which I do not believe is warranted), and you have rejected it.

Have a good night,

Tyrone A. Blackburn, Esq.  
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On Jan 26, 2022, at 11:05 PM, Judd Burstein <[jburstein@burlaw.com](mailto:jburstein@burlaw.com)> wrote:

Look. I am not interested in a debate. Here is my view.

Steven, I believe you are mistaken in your apparent belief that you and Tyrone are separate entities and that you can distance yourself from what the other says just by remaining silent. I assume Tara recognized the problem when she moved to withdraw. But I could be wrong. In any event I think you are stuck with what Tyrone says especially since you wrote a letter about the email I had written after Tyrone's sick obsession letter and implicitly supported his account. Maybe the judge will disagree, but it is up to you to chance that.

2. Tyrone, I expressed my OPINION of you just as you have done about me . I am not going to apologize for that. Nor do I ask you to apologize to me. But I think making an accusation that would be actionable but for the litigation privilege is very different. I am happy to explain the logjam to the Court.

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**From:** Steven Gordon <[sg@nytlaw.com](mailto:sg@nytlaw.com)>  
**Sent:** Wednesday, January 26, 2022 10:00:39 PM  
**To:** Judd Burstein <[jburstein@burlaw.com](mailto:jburstein@burlaw.com)>  
**Cc:** Emily Finestone <[EFinestone@burlaw.com](mailto:EFinestone@burlaw.com)>; Peter B. Schalk <[pschalk@burlaw.com](mailto:pschalk@burlaw.com)>; Tyrone Blackburn <[tblackburn@tablackburnlaw.com](mailto:tblackburn@tablackburnlaw.com)>; Victor Weberman <[vWeberman@burlaw.com](mailto:vWeberman@burlaw.com)>  
**Subject:** Re: Sanctions motion

Judd,

I did not say that you had an obsession with my wife, and your email candidly did make me consider withdrawing from this case for the safety of my wife and I. Nothing I said was inaccurate. The only obsession I alluded to is the one in which you will apparently do or say anything to try to personally harm me.

We will be awaiting your motion and will respond with our proposed briefing schedule.

On Wed, Jan 26, 2022 at 9:28 PM Judd Burstein <[jburstein@burlaw.com](mailto:jburstein@burlaw.com)> wrote:

Victor from my office will be emailing you our sanctions motion tonight. Substantively, it is final, but we still need to proof it more carefully and collect the exhibits. We will finish that up by Friday, but you will not receive anything that you do not already have available to you tonight.

I am having the motion sent to you tonight because I believe that it is fair for you to have a chance to analyze it before we seek to agree on a schedule. My view on scheduling depends upon whether you are prepared (after reading my papers) to withdraw all of the false claims which you have made about my supposed sick obsession with Steven's wife which led me to engage in creepy cyberstalking and thereby put Steven in fear for the safety of his family. If you will agree to acknowledge that these allegation are untrue in a way that publicly clears my name, I will agree to a schedule which gives you until March to answer my papers.

However, if you do not withdraw those accusations in full and in writing, I am going to push for an expedited briefing schedule in light of the fact that your vile accusations have been repeated on the internet.

Judd Burstein

Judd Burstein, P.C.

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**MY APOLOGIES IN ADVANCE FOR ANY TYPOGRAPHICAL AND/OR  
GRAMMATICAL ERRORS. I AM A TERRIBLE TYPIST AND PROOFREADER –  
PARTICULARLY WHEN I AM DRAFTING AN EMAIL UNDER TIME PRESSURE**

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